

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS**

MARIA ALEJANDRA CELIMEN SAVINO,  
JULIO CESAR MEDEIROS NEVES, and all  
those similarly situated,

Petitioners-Plaintiffs,

v.

STEVEN J. SOUZA,

Respondent-Defendant.

Case No. 1:20-cv-10617 WGY

**PLAINTIFFS' OPPOSITION TO EMERGENCY MOTION TO REVOKE BAIL**

Plaintiffs oppose Defendant's emergency motion to revoke the bail of Lucas Valentim. Defendant states that Mr. Valentim is to be arraigned in state court this morning. If this is correct, then a state court judge, weighing all of the appropriate factors, will determine whether bail should be set in that matter and/or other appropriate conditions placed upon Mr. Valentim. Mr. Valentim will be able to appear and potentially be appointed counsel who can make appropriate arguments on his behalf.<sup>1</sup> Following these proceedings, Defendant can re-file, or supplement, its Motion to Revoke Bail. At that point, the Court will have the benefit of additional pertinent information, in order to determine whether any change in bail status in this matter is warranted.

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<sup>1</sup> In light of the emergency nature of Defendant's motion, and the lack of any prior notice given, Plaintiffs' counsel have not been able to contact Mr. Valentim directly.

In general, Plaintiffs are concerned about Defendant's increasing rush to this Court with motions and requests that are based on facts that are only partially known. It is Plaintiffs' position that justice is better served on a more complete factual record, rather than through truncated proceedings that cut that possibility short.

### **CONCLUSION**

For the foregoing reasons, Defendant's Emergency Motion To Revoke Bail should be denied.

August 28, 2020

Respectfully Submitted,

/s/ Oren Sellstrom

Oren Nimni (BBO #691821)  
Oren Sellstrom (BBO #569045)  
Lauren Sampson (BBO #704319)  
Ivan Espinoza-Madrigal<sup>†</sup>  
Lawyers for Civil Rights  
61 Batterymarch Street, 5th Floor  
Boston, MA 02110  
(617) 988-0606  
onimni@lawyersforcivilrights.org

Muneer Ahmad<sup>†</sup>  
Michael Wishnie (BBO# 568654)  
Sara Zampierin<sup>±</sup>  
Jerome N. Frank Legal Svcs. Org.  
P.O. Box 209090  
New Haven, CT 06520  
Phone: (203) 432-4800  
[michael.wishnie@ylsclinics.org](mailto:michael.wishnie@ylsclinics.org)

Lisa Pirozzolo  
John Butts  
Vinita Ferrera  
Felicia Ellsworth  
Nicole M.F. Dooley  
Annaleigh Curtis  
Michael Brown  
Rama Attreya  
Gary Howell-Walton  
Mikayla C. Foster  
Elizabeth E. Driscoll  
Wilmer Cutler Pickering Hale and Dorr LLP  
60 State Street  
Boston, MA 021009  
Lisa.Pirozzolo@wilmerhale.com

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<sup>†</sup> Admitted *pro hac vice*.

<sup>±</sup> Motion for admission *pro hac vice* pending.

**CERTIFICATE OF SERVICE**

I hereby certify that, on August 28, 2020 notice of this filing will be sent by email to all parties.

Date: August 28, 2020

/s/ Oren Sellstrom  
Oren Sellstrom (BBO #569045)